

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

TAYAH LACKIE,

Court File No.: 0:24-cv-01684 LMP/LIB

Plaintiff,

vs.

MINNESOTA STATE UNIVERSITY
STUDENT ASSOCIATION, INC. d/b/a
STUDENTS UNITED; ST. CLOUD
STATE UNIVERSITY; GEORGE
SOULE, in his official capacity as Chair
of the Minnesota State Colleges and
Universities Board of Trustees; DAWN
ERLANDSON, in her official capacity as
Vice Chair of the Minnesota State
Colleges and Universities Board of
Trustees; JAY COWLES, JIM
GRABOWSKA, TIM HUEBSCH,
JERRY JANEZICH, JACQUELINE
JOHNSON, JANA JOHNSON, ROGER
MOE, JAVIER MORILLO,
CHRISTOPHER RICHTER, KATHY
SHERAN, and CHERYL TEFER, in
their official capacities as Members of
the Minnesota State Colleges and
Universities Board of Trustees; SCOTT
OLSON, in his official capacity as
Chancellor of the Minnesota State
Colleges and Universities; ROBBYN R.
WACKER, in her personal and official
capacity as President of ST. CLOUD
STATE UNIVERSITY, or her successor;
and LARRY LEE, in his personal and
official capacity as Vice President for
Finance and Administration at ST.
CLOUD STATE UNIVERSITY, or his
successor,

MINNESOTA STATE
UNIVERSITY STUDENT
ASSOCIATION, INC. D/B/A
STUDENTS UNITED'S
L.R. 7.1 WORD COUNT
COMPLIANCE CERTIFICATE

Defendants.

I, Tamara L. Novotny, certify that Defendant Minnesota State University Student Association, Inc. d/b/a Students United's Memorandum in Support of its Motion to Dismiss Amended Complaint complies with Local Rules 7.1(f) of the United States District Court for the District of Minnesota.

I further certify that, in preparation of this Memorandum, I used the processing program Word for Microsoft 365, and that this word processing program has been applied specifically to include all text, including headings, footnotes, and quotations in the following word count.

I further certify that the above referenced Memorandum contains 5,936 words.

COUSINEAU MALONE, P.A.

Dated: March 27, 2025

By: /s/ Tamara L. Novotny
Tamara L. Novotny #029617X
Attorneys for Minnesota State University
Student Association, Inc. d/b/a Students United
12800 Whitewater Drive, Suite 200
Minnetonka, MN 55343
952-546-8400
tnovotny@cousineaulaw.com

4902-5184-6703, v. 1